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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
MARIO DAVID SANCHEZ,)
)
)
Defendant.)

2:15-CR-00213-JAD-NJK

**STIPULATION TO CONTINUE
SENTENCING AND DISPOSITION
FOR MARIO D. SANCHEZ**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, MARIO DAVID SANCHEZ, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the trial in the above-captioned matter currently set for Tuesday September 5, 2017 at 9:00a.m. be vacated and continued to at least 60 days at a time convenient for the court.

This Stipulation is entered into for the following reasons;

1. Mr. Leventhal will be out of jurisdiction and will not be available.
2. Mr. Sanchez is not in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and she has no objection to this continuance.

1 4. Additionally, denial of this request for a continuance could result in a miscarriage
2 of justice.

3
4 DATED this 1st day of September, 2017.

5
6 /s/ Todd M. Leventhal
7 TODD M. LEVENTHAL, ESQ.
8 Counsel for Mario David Sanchez

/s/ Susan Cushman
 SUSAN CUSHMAN
 Assistant U.S. Attorney

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11 Submitted By: LEVENTHAL & ASSOCIATES, PLLC

12
13 By: /s/ Todd M. Leventhal
14 TODD M. LEVENTHAL, ESQ.
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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) 2:15-cr-00213-JAD-NJK
12 vs.)
13 MARIO DAVID SANCHEZ)
14 Defendant.)
15

16
17 **FINDINGS OF FACT**

18 Based on the stipulation of counsel, and good cause appearing, the Court finds that:
19

- 20 1. Mr. Leventhal will be out of jurisdiction and will not be available.
21 2. Mr. Sanchez is not in custody and agrees with the requested continuance.
22 3. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and
23 she has no objection to this continuance.
24 4. Additionally, denial of this request for a continuance could result in a miscarriage
25 of justice.

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1 **CONCLUSIONS OF LAW**

- 2 1. For all the above-stated reasons, the ends of justice would be best served by granting
3 a continuance of the current Sentencing and Disposition Hearing and reset it for a
4 time after December 4, 2017 at a time convenient for the court.
5

6 **ORDER**

7 Accordingly, IT IS SO ORDERED that the current Sentencing and Disposition is
8 vacated and the same is continued and reset for November 17, 2017 at the hour 9:00 a.m.

9
10 DATED this 5th day of September, 2017.

11 
12 JENNIFER A. DORSEY
13 UNITED STATES DISTRICT JUDGE

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on the 1st day of September, 2017 a true and correct copy of the,
16

17 **STIPULATION AND ORDER TO CONTINUE TIME FOR SENTENCING AND**

18 **DISPOSITION** was filed through the CM/ECF filing system and was electronically served to

19 the following registered addresses on file for this instant case :

20 Kevin R Stolworthy: kstolworthy@armstrongteasdale.com, cflynn@armstrongteasdale.com,

21 sdarling@armstrongteasdale.com
22

23 Susan Cushman: susan.cushman@usdoj.gov, Christie.M.Sequeira@usdoj.gov,

24 USANV.team3@usdoj.gov, caseview.ecf@usdoj.gov, denise.cope@usdoj.gov
25

26 /s/ Todd M. Leventhal

27 An Employee of TODD M. LEVENTHAL, ESQ.
28 LEVENTHAL AND ASSOCIATES, PLLC.